



SPECTRUM

Environmental Associates, Inc.
"EXCEEDING OUR CLIENTS EXPECTATIONS OF EXCELLENCE"

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APPROVED

February 20, 2015

Mr. Ed Smith
Harriman State Office Campus
Building 12, Room 154
Albany, New York 12240

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New York State Dept. of Labor
Engineering Services Unit
[Signature]

Re: Variance Petition # 14-0590
Former Beechnut Facility

Mr. Smith,

[Handwritten mark] Spectrum has been retained to provide asbestos consulting services for the remediation of asbestos from the warehouses located on the East side of the Canajoharie creek at the former Beech-Nut Facility. The administrative building and associated structures on the West side of the Canajoharie Creek are not part of this scope. Based on information provided by the owner, sub-contractor and current abatement contractor – abatement was previously performed on asbestos containing pipe insulation. It was performed by a different abatement contractor and monitoring firm using the above identified variance. That work was stopped by order of the NYSDOL by Mr. Lou Carrock due to issues with procedures, licensing and some illegal removals.

On January 21, 2015, Spectrum walked the entire warehouse space (approximately 365,000 SF) and noted several areas where suspect debris was on the floor. There were about 15-20 locations, each with less than a square foot of material being identified as assumed ACM. After speaking with Mr. Carrock of the NYSDOL it was agreed in principle that the best course of action was to follow the abatement methods outlined below:

- Project monitor shall be on site to observe abatement contractor's work practices and to provide visual inspections. Abatement work may not be performed unless project monitor is on site.
- A small project decontamination unit shall be constructed at a controlled entrance to the warehouses. All personnel must enter and exit the regulated abatement work area through the decontamination unit.
- Personal Protective Equipment. Abatement workers shall don appropriate personal protective equipment before entering the regulated abatement work area in compliance with Section 56-7.6.
- Abatement Procedures.
 - Workers in full PPE shall follow the supervisor and project monitor as they visually inspect the warehouse areas. and any suspect debris would be HEPA vacuumed as the inspection progressed thru the warehouses
 - Minor disturbances (<10 SF) shall be misted with amended water and cleaned up by the workers.

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- If any disturbance is identified that exceeds a minor project, that area will be cordoned off. A tent w/ air lock and negative pressure shall be constructed around the disturbance.
- Upon completion of cleanup, tent enclosures shall be visually inspected and clearance air sampling performed in accordance with 56-4. The tent/airlock used may be moved after it is wet wiped.
- Negative pressure and area monitoring of the warehouse areas need not be performed. The space is approximately 365,000 SF. There will be local HEPA filtration with cleanup and tent enclosures. Clearance monitoring would be performed for any tent enclosure constructed.
- Once the entire warehouse space has been cleaned of visual debris and cleared with visual inspections by the supervisor and project monitor and any necessary clearance air sampling of tent enclosures the abatement of the remaining ACM materials identified by previous reports would commence following the site specific variance 14-0590.

Thank you for considering this amendment to the variance. If this amendment is acceptable, this letter shall be attached to the approved variance and considered one and the same.

Sincerely,



James Capasso
Project Designer #91-06386

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New York State Dept. of Labor
Engineering Services Unit



FYI

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